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DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL PROTECTION

(Las Vegas Office)

555 E. Washington, Suite 4300

Las Vegas, Nevada 89101-1049

May 6, 1998

MS LISA MCCLAIN VANDERPOOL
HAZARDOUS WASTE MANAGEMENT DIVISION
US EPA REGION IX
75 HAWTHORNE STREET
SAN FRANCISCO CALIFORNIA 94103

Dear Lisa:

Enclosed you will find a copy of the Mohave Generating Station CEI inspection report. The inspection was conducted on April 24, 1998 and the report is being submitted to meet part of the 1997 NDEP-EPA grant commitment. The facility was identified as a large quantity generator (LQG) from the 1995 biennial report. At the time of the inspection they were considered to be a Large Quantity Generator.

If you have any questions or concerns regarding this inspection report, please contact the undersigned at (702) 486-2868.

Sincerely,

Laurie E. Sanders

Laurie E. Sanders
Environmental Scientist
Compliance and Enforcement Branch
Waste Management Bureau

cc: Tim Murphy, NDEP-Carson City Office

RCRA Compliance Evaluation Inspection Report

Nevada Division of Environmental Protection

Waste Management Bureau

FACILITY:	Mohave Generating Station P. O. Box 29505 2700 Edison Way Laughlin, Nevada 89029
EPA ID NUMBER:	NVD000630970
INSPECTION DATE:	April 24, 1998
INSPECTOR:	Laurie E. Sanders Environmental Scientist Compliance and Enforcement Branch
FACILITY REPRESENTATIVE:	Karl Gieszl, Environmental Specialist II
REPORT PREPARED BY:	Laurie E. Sanders
REPORT DATE:	April 27, 1998

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INTRODUCTION:

The Mohave Generating Station, located at 2700 Edison Way, Laughlin, Nevada, is managed by the Southern California Edison Company. It is jointly owned by the Nevada Power Company, the Salt River Project Agricultural Improvement and Power District, and the Southern California Edison. Mohave Generating Station provides electric power to communities in the States of California, Nevada, and Arizona. The station consists of 2 coal fired, steam turbine-generators, each rated at 790 megawatts, and their associated facilities. The plant consist of several support buildings, cooling towers, switch yard, coal storage and handling facilities, water storage facilities, waste water and fly ash disposal areas.

The plant uses coal slurry which is pumped from the Peabody Coal Company's Black Mesa Mine near Kayenta, Arizona, approximately 275 miles away. This slurry is stored in tanks and pumped through several high-speed centrifuges for de-watering. The coal is then fed into two large mills, reduced to the consistency of fine sand and injected into the boilers. In the past excess coal was de-watered and stored in semi-dry form in several ponds, those ponds have been decommissioned. The water resulting from the centrifuge operation is processed to recover coal fines. This water is then added to the condenser cooling water.

The Mohave Generating Station is a zero discharge facility. Waste water disposal is accomplished via reuse and evaporation. Waste waters are collected in several synthetic lined ponds to be evaporated, or held until treated and reused on site as make-up water for the boilers. The waste water discharge limitations, monitoring, and other conditions are addressed in the discharge permit (No. NEV 30007), issued to the facility by the Nevada Division of Environmental Protection (NDEP).

Air emissions are regulated by the state of Nevada under permit numbers OP2713, OP2714 Each steam generator is required to be equipped with electrostatic precipitators to remove particulate emissions. Fly ash generated from the burning of coal is removed and disposed on-site by an independent contractor, operating at the station.

NARRATIVE:

The Mohave Generating Station is surrounded with a perimeter fence. With in the boundary of the fencing are the boilers, electrical

switchyard (transformers), 90 day hazardous waste storage area, gasoline islands, lube oil tanks, bulk chemical storage tanks, water and waste water treatment facilities and several support buildings. Access to the site is controlled through the main gate and visitors are escorted about the plant by qualified personnel.

On April 24, 1998, NDEP representative Laurie E. Sanders conducted a Compliance Evaluation Inspection (CEI) at The Mohave Generating Station to determine the facility's compliance with all applicable State and Federal hazardous waste management regulations.

The CEI consisted of a walk-through inspection of the paint, maintenance, auto and mill shops, the regeneration area and revised elementary naturalization area, and the 90 day hazardous waste storage area. and a document review or the Waste water permit, the contingency plan, training records and the manifests. Mr. Karl Gieszl of Mohave Generating Station was the facility representative for both portions of the CEI.

FACILITY INSPECTION:

The facility inspection began with a walk-through of the station. It focused on hazardous waste management issues, primarily generation, handling, labeling and storage requirements.
The following areas were visited: machine shop, hazardous waste accumulation area, paint shop, maintenance shop, mill shop, boiler area, automotive shop, the elementary neutralization tank for the regeneration waste, the used oil storage area, the water and waste water management systems-including the peripheral ponds.

PAINT SHOP:

This area is located to the east rear of the administration buildings near the sand blasting area. A booth for sand blasting and an open area where bigger pieces (too large for the booth) are handled. Mr Gieszl stated that sand blast media had been checked and had come back as non-hazardous. The waste paint drum was labeled and had a closable funnel on it. This drum sits in a containment pallet at the rear of the shop.

HAZARDOUS WASTE 90-DAY ACCUMULATION AREA:

This area is delineated with a chain link fence which is locked. This area has a concrete berm and floor sloped to a central sump for containment should any material stored there leak. At the time of the inspection no hazardous waste was being held here. The fire extinguisher was present but had not been checked for over one

year. Currently an asbestos abetment program is being conducted in a shelter built within the 90 day storage area.

MAINTENANCE SHOPS:

The maintenance, auto and mill shop were then inspected. Each shop had a parts washer maintained by Safety Kleen. The Safety Kleen solvent appears to be the largest waste stream. Mr Gieszl and I talked about keeping the solvent tanks closed when not in use as most of them were not. Also located in these shops are the can puncturing devices. At this time none of the accumulation points have exceeded 55 gallons. Other waste generated in these shops are used and waste oil. Mr Gieszl stated that the facility has removed all chlorinated solvents from the facility as several instances have occurred where used oil has been upgraded to waste oil due to the combining of chlorinated solvents. Used oil is handled by First Recovery.

All containers are removed from the shops and moved to an area just east of the vehicle service shop on the west side of the property.

USED OIL STORAGE AREA:
This area is concreted and contains three large storage tanks. The most southerly thank is used for used oil. The area is burmed on the three sides not bordering the drainage ditch and sloped away from it. All appeared in order in this area.

ELEMENTARY NEUTRALIZATION AREA:

A new treatment area is the elementary neutralization area. Mohave Generating station has two large resin beds which periodically require regeneration with solutions of strong acid and caustic. Prior to the 1996 inspection these waste waters were allowed to join the collection stream feeding one of the waste water ponds where they were neutralized by each other and dilution. It was determined that the discharge did not meet the domestic sewer exclusion and therefore this practice was not acceptable. The operators then designed a system where the regeneration waters are fed into the collection tank for the effluent of the clarifiers used in the coal fine recovery process. In this tank the strong acid and caustic waste streams are neutralized to acceptable levels before the water continues to the lime soda water softener and is reclaimed for cooling water.

DOCUMENT REVIEW:

The document review portion of the inspection occurred at the

beginning of the inspection. This portion focused on record keeping requirements. Manifests for 1998 were examined for correct documentation, and completeness. The results of analytical waste determinations were examined to assure proper characterization. A review of the Contingency plan showed that the deficiencies noted in the 1996 inspection had been corrected. The list of the emergency coordinator's names and telephone numbers had been completed and was current, maps showing the location of fire extinguishers and spill containment equipment had been up dated. Mr Gieszl stated that the plan had been critiques the last time it had been initiated February 23, 1998 and that no revisions had been necessary. Training records, were examined to assure that training was current. The facility has initiated computer tracking of worker training. The system is very user friendly and clear except for assuring persons handling hazardous waste have met the requirements as set forth by the facility. This comes about because a listing showing which employees require this training have not been formulated. Mr. Gieszl is working on a list of employee positions and training requirements to clear up any vagueness. The biennial report, had been transferred to the library so that portion of the inspection was moved to that area. Also checked were the weekly inspection reports for the 90 day storage area and waste determinations kept there. No deficiencies were noted during the document portion of the inspection.

LIST OF ALLEGED VIOLATIONS:

1. NAC 444.8632 COMPLIANCE WITH FEDERAL REGULATIONS ADOPTED BY REFERENCE;

Failure to comply with all applicable requirements of Title 40 of the Code of Federal Regulations (CFR) Part 2, Subpart A, Part 124, Subparts A and B, and Parts 260 to 270, inclusive, Part 273 and Part 279, as those parts existed on March 5,1998, and as modified by NAC 444.86325, NAC 444.8633 and NAC 444.8634, including:

A. §262.34 TESTING & MAINTENANCE OF EQUIPMENT; by failure to meet the requirments of §265.33 - check yearly the fire extinguisher in the 90 day area.

The facility failed to check the fire extinguisher in the 90

day hazardous waste storage area in over a year.

GENERATORS OF HAZARDOUS WASTE
RCRA CEI CHECKLIST

FACILITY EPA ID#: NVD000630970

FACILITY NAME: Mohave Generating Station

LOCATION: 2700 Edison Way
Laughlin, Nv 89029
CITY, STATE, ZIP

INSPECTION DATE: 4/24/98

LEAD INSPECTOR: L. Sanders

OFFICE: Las Vegas

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TABLE OF CONTENTS:

NOTE: This checklist is updated to include final and published revisions of 40 CFR through 9/30/90.

Would Regen H_2O have to be listed on biennial OR is Elementary Neutralization exempt

Fire Ex in 90 day area not ckd

Writing in N.L.V

LARGE QUANTITY GENERATOR CHECKLIST
PAGE 2

FACILITY REPRESENTATIVES:

Karl

OTHER INSPECTORS:

DOCUMENTS COPIED OR REQUESTED:

Waste Water Permit #NEV30007 ✓
Contingency Plan ✓
Manifests 6/97 - 4/98 ✓

AREAS INSPECTED:

Fly Ash
Hazardous Waste Area (90 day)
Paint Shop / Maintenance Shop
Auto shop / Mill Shop
Chem Lab / Reagan Area.

FACILITY RECIPIENT OF REPORT:

MAILING ADDRESS:

HAZARDOUS WASTE DETERMINATION - 40 CFR PART 262 SUBPART A - 262.11:

	Yes	No	Comments
Has the generator of solid wastes made a HW determination by determining if the waste is: 262.11			
(a) Excluded from regulation under 261.4?	✓		
(b) Listed as a HW in 261 Subpart D?	✓		
n(c) For purposes of compliance with Part 268, or if the waste is not listed in Part 261, Subpart D, has the generator determined if the waste exhibits a characteristic identified in 261 Subpart C by either:			
(1) Testing the waste?	✓		
(2) Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used?	✓		
(d) If the generator has determined that his waste is hazardous, has the generator determined if the waste is excluded or restricted under 264, 265, or 268?	✓		

n NOTE: The disposal of the following PCB wastes and materials are exempt from regulation under Parts 261 through 265, and Parts 268, 270, and 124 and the notification requirements of Section 3010 of RCRA: 40 CFR Part 261.8

n (1) PCB-containing dielectric fluid and electric equipment containing such fluid authorized for use and regulated under Part 761 of 40 CFR; and that
n (2) Are hazardous only because they fail the test for the toxicity characteristic (hazardous waste codes D018 through D043 only).

RECYCLABLE MATERIALS - 40 CFR PARTS 261.6(a)(2) and 261.6(a)(3)

	Yes	No	Comments
Recyclable Materials: If the wastes are any of the following recyclable materials, also complete Part 266 Subparts C-G. 261.6(a)(2).			
(i) Those used in a manner constituting disposal (Subpart C)?		✓	Batteries that are cracked
(ii) HW burned for energy recovery in boilers and industrial furnaces not regulated as an incinerator (Subpart D)?	✓		
(iii) HW characteristic used oil that is burned as above (Subpart E)?		✓	
(iv) Those from which precious metals are reclaimed (Subpart F)?		✓	
(v) Spent lead-acid batteries that are reclaimed (Subpart G)?		✓	

Note: The following recyclable materials are exempt from EPA RCRA regulation, (see 261.6(a)(3)):

(i) Industrial ethyl alcohol that is reclaimed (unless provided otherwise in an international agreement.)

(ii) Used batteries or cells returned to the manufacturer for regeneration.

(iii) Used oil not burned for energy recovery.

(iv) Scrap metal.

(v-ix) Specified steel (K087) and petroleum refinery production wastes.

EPA IDENTIFICATION NUMBERS - 40 CFR PART 262.12

	Yes	No	Comments
Has the generator submitted a Notification of Hazardous Waste Activity (EPA Form 8700-12) and obtained an EPA ID number before handling HW? 262.12(a) and 262.12(b)	✓		
Has the generator offered HW only to transporters or TSDs with an EPA ID Number? 262.12(c)	✓		
[n] For generators of TC wastes only, did they Notify before 11/2/90? (55 FR 39411, 9/27/90)	N/A		

POINTS OF GENERATION - 40 CFR PARTS 262.34(c)(1) and 262.34(c)(2)

	Yes	No	Comments
The generator may accumulate HW at or near the point of initial generation without meeting storage deadlines provided: 262.34(c)(1)			
They have accumulated no more than 55 gallons of HW or one quart of acute HW? and:	✓		
The area is under the control of the operator of the process generating the waste? and:	✓		
(i) The container is in good condition, compatible with the waste, and kept closed (except when HW is being removed or added)?	✓		
(ii) The container is marked with the words "Hazardous Waste" or other words that identify the contents?	✓		
When HW accumulates in excess of the above amounts, does the generator continue to comply with the accumulation requirements above? 262.34(c)(2) and:			

POINTS OF GENERATION (CONT.) - 40 CFR PARTS 262.34(c)(1) and 262.34(c)(2)

	Yes	No	Comments
Mark the container holding the excess with the date the excess amount of HW began accumulating? and:	✓		
Comply with all 90-day accumulation requirements (262.34(a)) within three days?	✓		

90 DAY ACCUMULATION - 40 CFR PARTS 262.34(a) and 262.34(b)

	Yes	No	Comments
If the generator does not have interim status (as a TSD facility), have they accumulated HW on-site for less than 90 days? 262.34(a)?			90 Day area was Empty
Are containers visibly marked with the date accumulation started? 262.34(a)(2)			
Is each container or tank clearly marked with the words "Hazardous Waste"? 262.34(a)(3)			
Has the generator complied with requirements for owners/operators in Subparts C and D of Part 265, with 265.16 and with 268.7(a)(4)? 262.34(a)(4)			
If the generator has stored HW on-site for more than 90 days, have they:			
Been granted an extension from EPA?			

THE MANIFEST - 40 CFR PARTS 262.20, 262.21, 262.22 AND 262.23

	Yes	No	Comments
General Requirements: 262.20-			
(a) Does the generator prepare a complete manifest according to the instructions (see Part 262 Appendix) before transporting HW off-site?	✓		

THE MANIFEST (CONT.) - 40 CFR PARTS 262.20, 262.21, 262.22 AND 262.23

	Yes	No	Comments
(b) Does the generator designate on the manifest one facility which is permitted to handle the HW?	✓		
Did the generator use the supplied manifest required by a consignment State: 262.21-			
(a) Where the receiving facility is located? or, if not provided by that state:	✓		
(b) Where the generating facility is located?	✓		
(c) If not provided by either state, the EPA form from another source?	N/A		
Did the manifest consist of enough copies? 262.22			
Did the generator: 262.23(a)			
(1) Sign the manifest by hand?	✓		
(2) Obtain the signature of initial transporter and date of acceptance on manifest?	✓		
(3) Keep one copy of the manifest (per 262.40(a))?	✓		
Did the generator give the remaining copies of the manifest to the transporter? 262.23(b)	✓		

THE MANIFEST (CONT.) - 40 CFR PARTS 262.20, 262.21, 262.22 AND 262.23

	Yes	No	Comments
If the shipment was sent by water or rail, did the generator send at least 3 copies of the manifest to the designated facilities? 262.23(c),(d)	N/A		
For hazardous waste shipments to a facility in an authorized state, which is not yet authorized to regulate that waste as hazardous, has the generator: 262.23(e)			
(1) Confirmed that the facility receiving the waste agrees to sign and return the manifest to the generator?; and	✓		
(2) Confirmed that any out-of-state transporter signs and forwards the manifest to the designated facility?	N/A		

PRE-TRANSPORT REQUIREMENTS - 40 CFR PARTS 262.30, 262.31, 262.32 AND 262.33

	Yes	No	Comments
Is waste packaged in accordance with DOT packaging regulations (49 CFR 173, 178 and 179)? 262.30	✓		
Are waste packages labeled in accordance with DOT regulations (40 CFR 172.101)? 262.31	✓		
Are containers marked in accordance with DOT regulations (49 CFR 172.101)? 262.32(a) including:	✓		
Proper shipping name [table column 2]?	✓		
Proper ID number [table column 3A]?	✓		
Proper ORM designation for containers of ORM-A,B,C,D, or E wastes?	✓		

PRE-TRANSPORT REQUIREMENTS (CONT.) - 40 CFR PARTS 262.30, 262.31, 262.32 AND 262.33

	Yes	No	Comments
Are containers of 110 gallons or less marked with the following words?: 262.32(b)			
HAZARDOUS WASTE-Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.	✓		
Generators Name & Address _____	✓		
Manifest Document Number _____	✓		
Does the generator placard or offer the initial transporter the appropriate placards (49 CFR 172 Subpart F)? 262.33	✓		

RECORDKEEPING AND REPORTING - 40 CFR PARTS 262.40 THROUGH 262.43

	Yes	No	Comments
Are the following kept for at least three years: 262.40-			
(a) Manifests signed by the receiving facility?	✓		
(b) Biennial Reports and Exception Reports?	✓		
(c) Test results, waste analysis or other determinations made in accordance with 262.11?	✓		
Biennial Report: 262.41			
If the facility has shipped any waste off-site to a U.S. TSD, have they submitted a Biennial Report to the RA by March 1 of each even numbered year? 262.41(a)	✓		

RECORDKEEPING AND REPORTING (CONT.) - 40 CFR PARTS 262.40 THROUGH 262.43

	Yes	No	Comments
Was the report submitted on EPA Form 8700-13A and cover generator activities during the previous calendar year? 262.41(a)	✓		
Does the report include the following information: 262.41(a)-			
(1) EPA ID Number, name and address of the generator?	✓		
(2) Calendar year covered by the report?	✓		
(3) The EPA ID Number, name and address for each off-site U.S. TSD to which HW was shipped during the year?	✓		
(4) Name and EPA ID Number of each transporter used during the year to ship to a U.S. TSD?	✓		
(5) Description, EPA HW Number, DOT hazard class and quantity of each HW shipped off-site to a U.S. TSD?	✓		
(i) Was this information listed by EPA ID Number of each off-site U.S. TSD to which HW was shipped?	✓		
(6) A description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated?	✓		all chlor solvents - To Reduce solvent contaminated Oil
(7) A description of the changes in volume and toxicity actually achieved during the year in comparison to previous years (back to 1984 if available)?	✓		
(8) The signed certification?	✓		

RECORDKEEPING AND REPORTING (CONT.) - 40 CFR PARTS 262.40 THROUGH 262.43

	Yes	No	Comments
Exception Reporting: 262.42(a)-			
(1) For a generator of more than 1000 kg/mo. that has not received a signed copy of the manifest from the designated facility within 35 days, has the generator determined the status of the HW?	~~N/A~~ ✓		
(2) For a generator that has not received a signed copy of the manifest within 45 days, has the generator submitted an Exception Report to the Regional Administrator?	N/A		
Did the Exception Report include: 262.42(a)(2)-			
(i) A legible copy of the manifest for which the generator does not have confirmation of delivery?	N/A		
(ii) A signed cover letter explaining the efforts taken to locate the HW and the results of those efforts?	N/A		

GENERAL FACILITY STANDARDS - 40 CFR PART 265.16 - PERSONNEL TRAINING

	Yes	No	Comments
Does the facility have a HW personnel training program? 265.16(a)(1)	✓		
Is it directed by a person trained in HW management procedures? 265.16(a)(2)	✓		
Does the program include training in emergency procedures including contingency plan implementation? 265.16(a)(3)- and:	✓		
(i) Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment?	✓		
(ii) Key parameters for automatic waste feed cut-off systems?	✓		

GENERAL FACILITY STANDARDS (CONT.) - 40 CFR PART 265.16 - PERSONNEL TRAINING

	Yes	No	Comments
(iii) Communication or alarm systems?	✓		
(iv) Response to fire or explosions?	✓		
(v) Response to ground water contamination incidents?	✓		
(vi) Emergency shutdown of operations?	✓		
Are new personnel supervised until training is completed? 265.16(b)	✓		
Do new personnel complete the training within 6 months? 265.16(b)	✓		
Do personnel take part in an annual review of the initial training? 265.16(c)	✓		
Do personnel training records include for each HW position: 265.16(d)-			
(1) Job title and name of person filling the position?	✓		
(2) Job Description?	✓		
(3) Description of required HW training that will be given?	✓		
(4) Documentation that HW training or job experience required has been completed?	✓		
Are training records kept for current employees until closure, and past employees for at least 3 years? 265.16(e)	✓		

PREPAREDNESS AND PREVENTION - 40 CFR PARTS 265.30 THROUGH 265.37

	Yes	No	Comments
Is the facility maintained and operated to minimize the possibility of fire, explosion, or releases of HW or HW constituents to air, soil, surface water which could threaten human health or the environment? 265.31	✓		
Does the facility have the following equipment where applicable: 265.32-			
(a) Internal communications or alarm system capable of providing immediate emergency instruction (voice or signal)?	✓		
(b) Telephone or 2-way radios at the scene of operation?	✓		
(c) Portable fire extinguishers with water, foam, inert gas, dry chemical; spill control and decontamination equipment?	✓		
(d) Water at adequate volume and pressure, or foam producing equipment, or automatic sprinklers, or water spray systems?	✓		
Does the facility test and maintain all emergency equipment to assure proper operation in time of emergency? 265.33	✓		
Do personnel in areas where HW is being handled have immediate access to internal alarm or communication systems, or voice or visual contact with another employee? 265.34(a)	✓		
Can personnel that operate the facility while alone immediately access external emergency assistance? 265.34(b)	N/A		

Lat 35 80
Long 11/35 05

PREPAREDNESS AND PREVENTION (CONT.) - 40 CFR PARTS 265.30 THROUGH 265.37

	Yes	No	Comments
Is there adequate aisle space to allow for unobstructed movement of fire control, spill control and decontamination equipment in an emergency? 265.35	✓		
Arrangements With Local Authorities:			
Has the facility attempted to make the following arrangements/agreements:			
Familiarize police, fire department, and emergency response teams with HW operations? 265.37(a)(1)	✓		
Designate a primary emergency authority? 265.37(a)(2)	✓		
With state emergency response team, contractors and equipment suppliers? 265.37(a)(3)	✓		
Familiarize local hospitals with the properties of HW and the types of potential injuries and illnesses from exposure to HW? 265.37(a)(4)	✓		
Did the facility document in the operating record any refusal by state or local authorities to enter into such arrangements? 265.37(b)		N/A	

CONTINGENCY PLAN AND EMERGENCY PROCEDURES - 40 CFR PARTS 265.50 THROUGH 265.56

	Yes	No	Comments
Does the facility have a contingency plan designed to minimize hazards from fires, explosions, or any unplanned releases of HW or HW constituents to air, soil or water? 265.51(a)	✓		
Does the plan describe actions personnel must take to comply with 265.51 and 265.56 responses? 265.52(a)			
Does the plan describe the arrangements agreed to in 265.37? 265.52(c)	✓		
Does the plan list the current names, addresses, and phone numbers (office & home) of all persons qualified to act as emergency coordinators? 265.52(d)			
Does the plan name one person as primary emergency coordinator and list any others in order of responsibility Is it up to date? 265.52(d)	✓		
Does the plan list all emergency equipment including the location and physical description of each item on the list and a brief outline of its capability? 265.52(e)	✓		
Does the plan include an evacuation plan for personnel and a description of signals to begin evacuation, evacuation routes and alternate routes? 265.52(f)	✓		
Is the plan maintained at the facility? 265.53(a)	✓		
Has the plan been submitted to all local emergency organizations that may be called upon in responses? 265.53(b)	✓		Karl will Look into this

CONTINGENCY PLAN AND EMERGENCY PROCEDURES (CONT.) - 40 CFR PARTS 265.50 THROUGH 265.56

	Yes	No	Comments
Has the plan been reviewed and immediately amended whenever: 265.54-			
(a) Applicable regulations are revised?	✓		
(b) The plan fails in an emergency?	N/A		Also [illegible] 2/23/98
(c) Facility changes required it?	✓		
(d) The list of emergency coordinators changes?	✓		
(e) The list of emergency equipment changes?	✓		
Is there at all times at least one employee at the facility, or close by and on call, designated as emergency coordinator? 265.55	✓		
Is this coordinator thoroughly familiar with all aspects of site operations, including locations and characteristics of waste handled, the locations of records, the facility layout, and emergency procedures? 265.55	✓		
Does the coordinator have authority to commit the resources to carry out the contingency plan? 265.55	✓		
In the event that an emergency situation has occurred at this facility, did the emergency coordinator (EC) immediately:			
Activate alarm systems? 265.56(a)(1)	✓		
Notify the appropriate response agencies? 265.56(a)(2)	✓		
Identify the character, exact source and amount, and real extent of any released materials? 265.56(b)	✓		

CONTINGENCY PLAN AND EMERGENCY PROCEDURES (CONT.) - 40 CFR PARTS 265.50 THROUGH 265.56

	Yes	No	Comments
Assess the possible direct and indirect hazards from the release, including gases and run-off of fire fighting materials? 265.56(c)	✓		
If assessment indicates the release could threaten harm outside the facility, does the EC: Report his findings to appropriate authorities if it may be advisable to evacuate the local area, and remain on call to help the authorities decide? 265.56(d)(1)	N/A		
Immediately notify either the government on-scene coordinator or the National Response Center's toll-free line at 800-424-8802? 265.56(d)(2)	N/A		
Did the report include: 265.56(d)(2)-			
(i) The name and phone number of the reporter?	✓		
(ii) Name and address of the facility?	✓		
(iii) Time and type of incident?	✓		
(iv) Name and quantity of materials involved to the extent known?	✓		
(v) The extent of any injuries?	N/A		
(vi) The possible hazards to human health and the environment outside the facility?	N/A		
During the emergency, does the E.C. take all reasonable measures to minimize the release? 265.56(e)	✓		
If the facility had to stop operations to respond, does the E.C. monitor all appropriate equipment? 265.56(f)	✓		

CONTINGENCY PLAN AND EMERGENCY PROCEDURES (CONT.) - 40 CFR PARTS 265.50 THROUGH 265.56

	Yes	No	Comments
the facility: 265.56(h)-			
After the emergency, does the EC immediately provide for the TSD of recovered or contaminated material resulting from the release? 265.56(g)	✓		
Does the EC ensure that in the affected areas p153Xresume?			
(1) Wastes incompatible with the released material are not handled until after clean-up is complete?	✓		
(2) All emergency equipment is clean and fit for use before operations	✓		
Does the facility notify the Regional Administrator and state and local authorities that the above has been done before resuming operations in affected areas? 265.56(i)	✓		
If the contingency plan has been implemented:			
Did the operating record include the date, time, any details of each incident that required implementation of the contingency plan? 265.56(j)	✓		
Within 15 days after the incident, did the facility submit a written report to the Regional Administrator? 265.56(j) and 265.77(a)	✓		
Did the report include: 265.56(j)-			
(1) Name, address and phone # of the owner or operator?	✓		
(2) Name, address, and phone # of the facility?	✓		
3) Date, time, and type of incident?	✓		

CONTINGENCY PLAN AND EMERGENCY PROCEDURES (CONT.) - 40 CFR PARTS 265.50 THROUGH 265.56

	Yes	No	Comments
(4) Name and quantity of materials involved?	✓		
(5) The extent of any injuries?	~~✓~~	N/A	
(6) A hazard assessment?	✓		
(7) An estimate of the quantity and disposition of recovered material?	✓		

USE AND MANAGEMENT OF CONTAINERS - 40 CFR PARTS 265.170 THROUGH 265.177

	Yes	No	Comments
Does the facility transfer HW from containers not in good condition or leaking to containers in good condition? 265.171	✓		
Are containers compatible with the HW stored in them? 265.172	✓		
Are containers stored closed? 265.173(a)	✓		
Are containers managed to prevent rupture or leakage? 265.173(b)	✓		
Are containers inspected weekly for leaks and deterioration? 265.174	✓		
Are ignitable or reactive wastes stored at least 50 feet from the facility's property line? 265.176	✓		
Are incompatible wastes stored in separate containers? 265.177(a)	✓		
Is HW not placed in unwashed containers that previously held an incompatible waste or material? 265.177(b)	✓		

USE AND MANAGEMENT OF CONTAINERS (CONT.) - 40 CFR PARTS 265.170 THROUGH 265.177

	Yes	No	Comments
Are containers holding HW that is incompatible with any waste or materials stored nearby in other containers, piles, open tanks, or surface impoundments separated from the incompatibles by sufficient distance or protected by means of a dike, berm, wall, or other device? 265.177(c)		N/A	

LAND DISPOSAL RESTRICTIONS - 40 CFR PART 268

	Yes	No	Comments
Did the facility handle any waste restricted from land disposal since its effective prohibition date?:* 268.1(b) (See Attachment A for listings)			
F001 through F005 spent solvents?	✓		
F020 through F026-28 Dioxins?		✓	
"California List" wastes?			
First Third scheduled wastes?			
Second Third scheduled wastes?			
n Third Third scheduled wastes?			
n Exemptions: Are the restricted wastes exempted from land disposal restrictions because:			
They are hazardous only by characteristic and disposed into a non-hazardous or hazardous injection well as defined in Part 144.6(a) and do not exhibit any prohibited characteristic of hazardous waste at point of injection? 268.1(c)(3)			
An "imminent endangerment" waiver has been granted under 121(d)(4) of CERCLA? 268.1(d)		N/A	
The waste is from conditionally-exempt small quantity generators? 268.1(e)(1)		N/A	
. farmer is disposing of waste pesticides in accordance with 262.70? 68.1(e)(2)		N/A	

LAND DISPOSAL RESTRICTIONS (CONT.) - 40 CFR PART 268

	Yes	No	Comments
▫ EPA has not promulgated land disposal prohibitions or treatment standards for wastes identified or listed as hazardous after November 8, 1984? 268.1(e)(3)		N/A	

▫ *Land disposal means placement in or on the land and includes, but is not limited to, placement in a landfill, surface impoundment, waste pile, injection well, land treatment facility, salt dome formation, salt bed formation, underground mine or cave, or placement in a concrete vault or bunker for disposal purposes. 268.2(c) Injection wells are being covered under a separate schedule (Part 148).

NOTE: If no restricted wastes were handled after the effective dates or an above exemption applies to all restricted wastes handled, do not complete remainder of this section.

▫ Exceptions: Can the restricted wastes continue to be land disposed because:

A case-by-case extension has been granted under Subpart C or 268.5, for the wastes handled? 268.1(c)(1-4), 268.30(d)(3)(F001-5), 268.31(d)(3) (dioxins), 268.32(g)(2)(CA list), 268.33(e)(3)(1st 3rd)(2nd 3rd), 268.35(i)(4)(3rd 3rd), 268.1(c)(2)			
An exemption has been granted because the waste is certified treated by the best demonstrated available technology (BDAT)? 268.44(a)		N/A	

If any of the preceding exceptions apply, the attached effective 268 Subpart C dates and concentrations, Subpart D standards and Subpart E storage restrictions do not apply. Waste analysis and applicable generator certification requirements still pertain.

LAND DISPOSAL RESTRICTIONS (CONT.) - 40 CFR PART 268

	Yes	No	Comments
n Except for characteristic wastes subsequently discharged under NPDES permit or in compliance with pretreatment requirements under Section 307 of the CWA, has the handler not merely diluted the restricted waste or treatment residue in order to achieve compliance? 268.3		✓	
Storage:			
Are restricted wastes only being stored elsewhere by the generator, using			
or containers while accumulating a sufficiently large batch to properly recover, treat, or dispose?	✓		
Generators: Waste Analysis			
If restricted wastes are generated were CA list liquids? 3Xsolids knowledge or analysis, determined if the waste is restricted from land disposal? 268.7(a)			
Was the Paint Filter Liquids Test used to determine if waste sludges and 268.32(i)	N/A		
Did the generator determine if liquid CA list wastes sludges an solids were CA list liquids? 268.32(j)(1)			
n Did the generator determine if liquid CA list wastes containing PCBs or HOCs were prohibited? 268.32(j)(2)			

LAND DISPOSAL RESTRICTIONS (CONT.) - 40 CFR PART 268

	Yes	No	Comments
Did the generator determine whether a HW listed in 268.10, -.11, -.12, exceeds the applicable treatment standards specified in 268.41, and -.43 by testing a representative sample of the waste extract or the entire waste, or use knowledge of the waste? 268.35(j)	✓		
Where waste treatment standards are expressed as concentrations in the waste extract (268.41), did any analysis include the TCLP (268 Appendix I)? 268.33(g)	✓		
Notices, Certifications, and Demonstrations:			
If determined that the waste is restricted and requires treatment before land disposal, have they notified the treatment or storage facility with each shipment of waste? including: 268.7(a)(1)-	✓		
(i) EPA HW ID number?	✓		
(ii) Appropriate treatment standards and prohibitions?	✓		
(iii) Manifest number for the waste?	✓		
(iv) Available waste analysis data?	✓		
If the waste is determined to be restricted but not required further treatment, has the generator submitted with each shipment to the treatment, storage or land disposal facility, a notice and a certification that the waste meets both treatment standards and applicable prohibitions? 268.7(a)(2)	✓		
Did the notification include: 268.7(a)(2)(i)-	✓		
(a) EPA HW ID number?			

LAND DISPOSAL RESTRICTIONS (CONT.) - 40 CFR PART 268

	Yes	No	Comments
(b) Appropriate treatment standards and prohibitions?	✓		
(c) Manifest number for the waste?	✓		
(d) Available waste analysis data?	✓		
Was the following certification signed? 268.7(a)(2)(ii)-			

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

NOTE: If the recipient of the generator's waste is not on the attached list of known land ban facilities (see Attach. A), or if an off-site shipment without notification has occurred, indicate below, or on Attach. A, the name of the accepting TSD facility for proper follow-up.

If the generator's waste is subject to an exemption from a prohibition on the type of land disposal method utilized for such waste (e.g., a case-by-case extension under §268.5, an exemption under §268.6, or a nationwide variance), have they notified the receiving facility with each shipment of waste that the waste is not prohibited from land disposal? 268.7(a)(3)	N/A		
Did the notice include: 268.7(a)(3)-			
(i) EPA HW ID number?			
ii) Appropriate treatment standards and prohibitions?			
iii) Manifest number for the waste?			

LAND DISPOSAL RESTRICTIONS (CONT.) - 40 CFR PART 268

	Yes	No	Comments
(iv) Available waste analysis data?			
(v) The date the waste is subject to prohibitions?			
n If a generator is treating prohibited wastes in tanks or containers to meet applicable treatment standards, has a waste analysis plan been developed and implemented which:			
n(a) Is kept on-site in the generator's records? 268.7(a)(4)			N/A
n(b) Is based on chemical and physical analysis of waste(s) being treated and contains all information to treat waste in accordance with standards, including the selected testing frequency? 268.7(a)(4)			N
n(c) Was filed with the RA or authorized state a minimum of 30 days prior to treatment? 268.7(a)(4)			
n Have wastes shipped off-site complied with notification requirements of 268.7(a)(2)? 268.7(a)(4)	✓		
If determined that the waste is restricted based solely on knowledge, is all supporting data used in the determination maintained on-site in the generator's files? 268.7(a)(5)			N/A
Has the generator retained on-site a copy of all notices, certifications, waste analysis data, and other Part 268 records for at least five years? 268.7(a)(6)	✓		

LAND DISPOSAL RESTRICTIONS (CONT.) - 40 CFR PART 268

	Yes	No	Comments
▫ If a generator is managing a labpack that contains wastes identified in Part 268, Appendix IV*, and wishes to use the alternative treatment standard under 268.42, has the generator, with each shipment of waste, noticed the treatment facility pursuant to 268.7(a)(1)? 268.7(a)(7)	___	___	Haven't sent Lab pack yet
▫ Complied with 268.7(a)(5) and (a)(6) and submitted the following certification? 268.7(a)(7)	___	___	_____

I certify under penalty of law that I personally have examined and am familiar with the waste and that the labpack contains only the wastes specified in Appendix IV to Part 268 or solid wastes not subject to regulation under 40 CFR Part 261. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine or imprisonment.

▫ If a generator is managing a labpack that contains organic wastes specified in Part 268, Appendix V*, and wishes to use the alternative treatment standards under 268.42, has the generator, with each shipment of waste, noticed the treatment facility pursuant to 268.7(a)(1)? 268.7(a)(8)	___	___	_____

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste and that the labpack contains only organic wastes specified in Appendix V to Part 268 or solid wastes not subject to regulation under 40 CFR Part 261. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine or imprisonment.

If the facility is a small quantity generator with tolling agreements pursuant to 262.20(e), has it complied with notification and certification requirements of 268.7(a) for the initial shipment of waste subject to the agreement? 268.7(a)(9)	___	___	_____

and,

LAND DISPOSAL RESTRICTIONS (CONT.) - 40 CFR PART 268

	Yes	No	Comments
ⁿ Retained a copy, on-site, of notification, certification, and tolling agreement, for at least 3 years after expiration of agreement? 268.7(a)(9)	N/A		
ⁿ Special Rules for Wastes that Exhibit a Characteristic:			
ⁿ Did the initial generator determine each waste code applicable to the waste pursuant to 268.9(a) and (b)?	✓		
* See Attachment E. for copy of Appendices IV & V.			
ⁿ In addition to any applicable standards determined from the initial point of generation, has the characteristic waste that has been land disposed complied with the treatment standards under Part 268 Subpart D? 268.9(c)	✓		
ⁿ Has a notification and certification, required in 268.9(d), been sent to the RA or authorized state for shipment of non-hazardous waste to a Subtitle D facility? 268.9(d)	✓		
ⁿ Did the notification include the following: 268.9(d)(1)			
(i) Name and address of the Subtitle D facility?	✓		
(ii) Description of waste as initially generated, including applicable EPA Hazardous Waste Number(s) and treatability group(s)?	✓		
(iii) Applicable treatment standards at initial point of generation?	✓		

LAND DISPOSAL RESTRICTIONS (CONT.) - 40 CFR PART 268

	Yes	No	Comments
n Has the certification been signed by an authorized representative and does it state the language in 268.7(b)(5)(i)? 268.9(d)(2)	✓		

ATTACHMENT A

Identified TSDFs that treat LDR Waste:

AZD049318009	Buds Oil Service
AZD980816102	Environmental Waste Entpr
AZT050010230	Esco
AZD089308803	Safety Kleen
AZD980802897	Safety Kleen
AZD009015389	Southwest Solvents
AZD049314370	Rinchem Co. Inc.
CAD074644659	Baron Blakeslee
CAT000618652	Baron Blakeslee
CAT080014079	Bay Area Environmental
CAD028409019	Crosby & Overton
CAD000633115	IT Corp., San Jose Transfer
CAD008302903	Oil & Solvent Processing
CAD042245001	Omega Chemical
CAD029363876	Orange County Chemical Co.
CAT080012651	Orange County Chemical Co.
CAD095894556	Pacific Treatment Company
CAD008364432	Rho-Chem
CAD980737548	Roehl Corporation
CAD009452657	Romic Chemical
CAD066113465	Safety Kleen
CAD077187888	Safety Kleen
CAD093459485	Safety Kleen
CAD980894562	Safety Kleen
CAT000613935	Safety Kleen
CAT000613919	Safety Kleen
CAD066177783	Safety Kleen
CAT000613893	Safety Kleen
CAT000613976	Safety Kleen
CAT000613992	Safety Kleen
CAT000613950	Safety Kleen
CAT000613927	Safety Kleen
CAD080916968	Safety Kleen
CAD980892475	Safety Kleen
CAT000613984	Safety Kleen
CAD053044053	Safety Kleen
CAD980817159	Safety Kleen
CAT000613943	Safety Kleen

LAND DISPOSAL RESTRICTIONS (CONT.) - 40 CFR PART 268

CAT000613968 Safety Kleen
CAD059494310 Solvent Services
CAT080033681 Chem Tech Inc. (formerly Triple J Pacification)
NVD980895338 Eticam

NEVADA STATE-SPECIFIC REGULATIONS:

	Yes	No	Comments
Did the generator include in the manifest the hazardous waste number assigned by the US EPA? NAC 444.8655(1)	✓		
Did the manifest consist of at least the number of copies which provided the division, the generator, each transporter and the operator of the designated facility, with one copy each? NAC 444.8655(2)(a), (b), and (c)	✓		
Did the generator send one copy of the generator's returned copy from the out-of-state facility to the division within 30 days of his receipt of that copy? NAC 444.8655(3)	✓		
Did the generator who accumulates or stores hazardous waste on site include on the label of each container of hazardous waste the hazardous waste number assigned by the US EPA? NAC 444.8671	✓		
Has the generator submitted to the director a report for the hazardous waste generated during odd-numbered years no later than March 1 of the next following even-numbered year? NAC 444.8675(1)	✓		
Did the report contain the information requested on the appropriate form supplied by the division? NAC 444.8675(2)	✓		

NEVADA STATE-SPECIFIC REGULATIONS (CONT.):

	Yes	No	Comments
Did the generator retain a copy of each of his biennial reports for at least 3 years after the report became due? NAC 444.8675(3)	✓		
Did the generator who accumulates hazardous waste on site maintain a written record of container and tank inspections conducted and were these records kept on-site for a minimum of 3 years? NAC 444 Section 2,	✓		
and,			
Did the inspection records include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions? NAC 444 Section 2	✓		